

**REMARKS**

Applicants respectfully request reconsideration of this application in view of the foregoing amendments and the following remarks.

**CLAIM STATUS**

Claims 1-43 are pending in the application and are rejected. Claims 1 and 19 are herein amended. No new matter is presented.

**Rejections Under 35 U.S.C. §103**

Claims 1-43 have been rejected under 35 USC §103(a) as allegedly being unpatentable over U.S. Patent No. 6,385,621 to Frisina (“Frisina”) in view of U.S. Patent No. 5,930,460 to Noumaru et al. (“Noumaru”).

The Examiner contends that Frisina teaches all elements of the present invention in claims 1 and 19, other than the “target work standard”. The Examiner also alleges that Noumaru teaches a “target work”, and further alleges that the combination of Frisina and Noumaru renders the present invention obvious.

Applicants respectfully disagree with the examiner in attributing the elements of the claimed invention to Frisina and Noumaru and believe that these elements, as claimed, do not exist in the cited prior art references taken separately or combined.

First, Frisina is directed towards a software tool that integrates a job planning program with a standard development program, in order to allow a user to use such work standards to build a complete job plan. Frisina discloses a method for making the information generated from one program available to the other program, thus eliminating the need for manually inputting the output of one program as an input in the second program. While both the job planning program and the standard development program relate to resource management, the

teachings of Frisina differ from the present invention.

In one regard, while Frisina teaches having databases associated with job standards program, it does not teach associating each work standard in the work standards database with “an expression and a manhour”, as the Examiner contends. In the present invention, each of the work standards in the database is described by an “expression” composed of an operation phrase, an object phrase and a comment phrase. Frisina does not teach or disclose a work standard having an expression that is characterized by these attributes.

Additionally, under the present invention, a target work standard having an expression that is similar to the expression used in the work standard is provided and the expressions of the target work standard are matched to a work standard for the purpose of assigning manhour data to the target work standard. While the Examiner admits that Frisina does not “explicitly teach” the target work standard, the Examiner nonetheless goes on to assert that Frisina teaches “setting means for, for each target work standard to which manhours are to be given, matching an expression of target work standard with the standard expression of the work standards”. Applicants submit that since the target work standard does not exist in Frisina, then the setting means for such target work standard consequently can not exist in Frisina either. Frisina’s focus is on a work plan and not on a target work standard. As indicated in Frisina col. 3, lines 3-21, the user arrives at the work plan by optimizing the initial input parameters, and not by matching the characterizing expressions with a work standard expression. Thus, the work plan described in Frisina is different from the target work standard of the present invention.

On the other hand, Noumaru relates to a teaching program automatic generation apparatus capable of automatically generating an optimum teaching program for, e.g., a robot, with simple operations. The teaching program determines the target work based on the operation

contents required for each type of work, types of facilities, operation factors arranged in time series for each manipulator and interlock information between manipulators. See Noumaru, col. 2, lines 37-48. In Noumaru, the target work has no associated manhour information. In fact, manhour is not mentioned anywhere in Noumaru. Thus, the "target work" in Noumaru is different from the "target work standard" of the present invention.

Moreover, the present invention teaches providing a link to a graphic file of an image representing the process to be performed in advance (see Figure 24 and page 32, line 4 through page 33, line 11). Under the present invention, the operator is able to see the process display and confirm the work contents, notes tools and parts at a glance. This element does not exist in either Frisina or Noumaru. Thus, to further clarify at least the graphic distinction between cited art and the present invention as claimed, Applicants have herein amended independent claim 1 and 19 to recite such feature. Applicants respectfully submit that at least this feature of the claimed present invention, as amended, is not contemplated by Frisina and/or Noumaru.

Accordingly, since the elements of the present invention as claimed are not taught or suggested by either Frisina or Noumaru, the present invention is believed patentable over these references taken separately or combined for at least the stated reasons.

#### Dependent Claims

Applicants have not independently addressed the rejections of the dependent claims because, as the independent claims from which the dependent claims depend are allowable for at least the reasons discussed *supra*, the dependent claims are believed allowable for at least similar reasons. Applicants however, reserve the right to address such rejections should such response be necessary and appropriate.

Accordingly, Applicants respectfully submits that the invention as recited in claims 1-43 as amended herein is neither anticipated by, nor rendered obvious in view of, the cited references Frisina and/or Noumaru, taken individually or in combination.

Applicants respectfully submit that claims 1-43 as amended herein are allowable over the prior art of record and that the respective rejections be withdrawn and that the application hereby placed in condition for allowance which action is earnestly solicited.

**CONCLUSION**

In view of the foregoing, Applicants respectfully request reconsideration and allowance of this application.

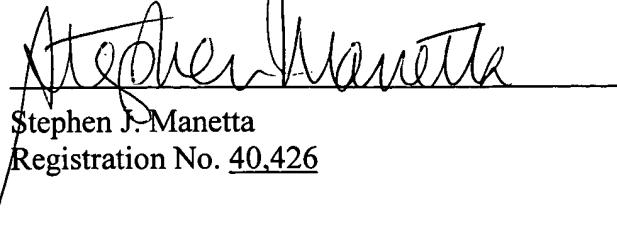
Applicants believe no fees are required for this Amendment and Request for Reconsideration and that no extension of time is required. However, should an extension of time be necessary to render this filing timely, such is hereby petitioned, and the Commissioner is hereby authorized to charge any additional fees which may be required for this paper, or credit any overpayment, to Deposit Account No. 13-4500, Order No. 1232-4671.

In the event that a telephone conference would facilitate prosecution, the Examiner is invited to contact the undersigned at the number provided.

Respectfully submitted,  
MORGAN & FINNEGAN, L.L.P.

Dated: October 29, 2003

By:

  
Stephen J. Manetta  
Registration No. 40,426

Correspondence Address:  
Morgan & Finnegan, L.L.P.  
345 Park Avenue  
New York, NY 10154  
(212) 758-4800 (Telephone)  
(212) 751-6849 (Facsimile)